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March 8, 2024

VIA ECF

Hon. Victoria Reznik
U.S. Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,
Case No. 7:13-cv-09239-CS-VR and Related Case No. 7:15-CV-07950**

Dear Judge Reznik:

We are counsel for British Airways PLC in the matter *The Wave Studio, LLC v. British Airways PLC, et al.*, Case no. 7:15-cv-07950-CS, which has been consolidated with the above-captioned case. We write pursuant to your March 1, 2024 Order, directing Defendants to provide insurance information or objections to the production of insurance information by March 7, 2024.

In line with the Court's Order, we have worked diligently to determine any insurance coverage. We apologize for being a day late in responding to the Court, but we were just able to speak with our client late yesterday to confirm the situation. Similar to Defendant American Express (D.I. 349), we have determined that there is potentially applicable insurance coverage but further investigation is necessary given the length of time over which the alleged claims occurred and changes in corporate structure that have occurred since that time period. Despite its best efforts, British Airways has not yet been able to complete its investigation to determine whether there is any applicable insurance coverage to disclose, and therefore respectfully requests additional time to seek out and provide this information. We anticipate being able to provide this information by March 22, 2024.

Regards,

A handwritten signature in blue ink, appearing to read 'WILL FRANKEL', with a stylized flourish at the end.

William H. Frankel